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Sterling, VA [REDACTED]

March 19, 2012

Mr. Frank Borris
U.S. DOT/NHTSA
Office of Defects Investigation
1200 New Jersey Ave., SE
Room W48-338
Washington, DC 20590

Mr. Borris,

I have a serious problem with my 2006 Dodge Grand Caravan headlights, and I am deeply concerned that Dodge has not recalled its defective equipment. I reported the problem to the NHTSA last week via phone (ODI #: 10451773), but the filed report isn't entirely accurate. Over the last two years, on several occasions, my headlights have not illuminated when I have toggled the switch to turn them on. After toggling the switch on and off several times, they have always finally worked. I once had a mechanic look at the exterior lighting and he couldn't find any problem with it.

About a month ago, I experienced this problem again and did the usual 'on-off' toggling and the lights went on. About ten minutes later and driving at night, I suddenly realized that the lights were not functioning at all. Within a few seconds, they came back on. It happened again about five minutes later. Fortunately, I was traveling in a well-lit area. Nevertheless, the occurrence made me uneasy about driving my car at night.

Last week, I got in my car to run out at night for a quick errand. As I pulled out of my well-lit street with my four-year old strapped in his booster seat, I realized that my headlights were not on, despite the fact that I had turned the exterior headlight switch to the 'on' position. Annoyed, I did the usual 'on-off' toggle several times. The headlights remained off. Alarmed, I pulled over and turned off the engine and tried again. After several attempts and still no headlights, I gave up and drove home with no lights (fortunately only about 1/10 mile). The next day, I tried to turn the headlights on several times to no avail. I finally took my car to a mechanic, and, of course, the headlights turned on with no problem. I tried again, and they failed to turn on. Another toggle or two and they went on again. The original mechanic and another one couldn't figure out why the lights would have this problem. Frustrated, I called a Dodge dealership and spoke to a mechanic. He said he had never heard of the problem and said the service department wouldn't be able to help me unless it could duplicate the problem.

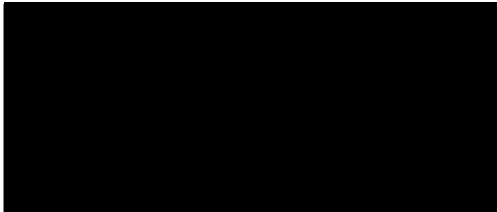
Mystified, I decided to research the issue on the internet. Lo and behold, a preliminary search found HUNDREDS of accounts of the same problem with other Dodge Caravan owners. The bulk of the accounts were from owners of 2005 models, with numerous accounts from 2006 owners and others as well. I now know that this is a known problem to the NHTSA and Dodge. According to the NHTSA website, your Office of Defects Investigations upgraded its initial investigation to an Engineering Analysis (EA11-010).

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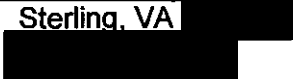
Clearly, using the "Safety-Related Defect" definition provided by the NHTSA on its website (attached), this faulty headlight issue is a critical defect that requires immediate action on the part of your agency.

I'm no longer mystified; I'm furious! I drive my Dodge Grand Caravan every day, usually ferrying around one or more of my four children and often other children as well. My lights are essential when I am driving at night, in poor weather, or in other low visibility conditions. Not having headlights on such occasions is unacceptable! For Dodge to play 'Russian roulette' with this headlights issue is dangerous, irresponsible, and potentially deadly. Until this serious issue arose, I was a huge fan of my vehicle. I am now leery of driving it, particularly in the evening, since I can't be sure that the headlights will work.

Mr. Borris, what would you do in my shoes? Would you continue to drive your vehicle knowing that the lights might cut out on you at any time? Please tell me what the NHTSA is doing to rectify this dangerous problem and what I need to do to get this serious issue corrected for all Dodge Caravan owners.



Sterling, VA



cc:

David Strickland, NHTSA Administrator

Ronald Medford, NHTSA Deputy Administrator

Daniel C. Smith, NHTSA Senior Associate Administrator, Vehicle Safety

Nancy Lewis, NHTSA Associate Administrator, Enforcement

What is a safety-related defect?

The United States Code for Motor Vehicle Safety (Title 49, Chapter 301) defines motor vehicle safety as “the performance of a motor vehicle or motor vehicle equipment in a way that protects the public against unreasonable risk of accidents occurring because of the design, construction, or performance of a motor vehicle, and against unreasonable risk of death or injury in an accident, and includes nonoperational safety of a motor vehicle.” A defect includes “any defect in performance, construction, a component, or material of a motor vehicle or motor vehicle equipment.” Generally, a safety defect is defined as a problem that exists in a motor vehicle or item of motor vehicle equipment that:

- poses an risk to motor vehicle safety, and
- may exist in a group of vehicles of the same design or manufacture, or items of equipment of the same type and manufacture.

Examples of defects considered safety-related

- Steering components that break suddenly causing partial or complete loss of vehicle control.
- Problems with fuel system components, particularly in their susceptibility to crash damage, that result in leakage of fuel and possibly cause vehicle fires.
- Accelerator controls that may break or stick.
- Wheels that crack or break, resulting in loss of vehicle control.
- Engine cooling fan blades that break unexpectedly causing injury to persons working on a vehicle.
- Windshield wiper assemblies that fail to operate properly.
- Seats and/or seat backs that fail unexpectedly during normal use.
- Critical vehicle components that break, fall apart, or separate from the vehicle, causing potential loss of vehicle control or injury to persons inside or outside the vehicle.
- **Wiring system problems that result in a fire or loss of lighting.**
- Car ramps or jacks that may collapse and cause injury to someone working on a vehicle.
- Air bags that deploy under conditions for which they are not intended to deploy.
- Child safety seats that contain defective safety belts, buckles, or components that create a risk of injury, not only in a vehicle crash but also in non-operational safety of a motor vehicle.

Source: <http://www-odi.nhtsa.dot.gov/recalls/recallprocess.cfm>

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